

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X	
DERRICK PALMER, KENDIA MESIDOR,	:
BENITA ROUSE, ALEXANDER ROUSE,	:
BARBARA CHANDLER, LUIS PELLOT-	:
CHANDLER, and DEASAHNI BERNARD,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
AMAZON.COM, INC., and AMAZON.COM	:
SERVICES LLC,	:
	:
Defendants.	:
-----X	

Case No. 1:20-cv-2468-BMC

Oral Argument Requested

**DECLARATION OF JASON C. SCHWARTZ IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF THEIR MOTION TO DISMISS**

I, Jason C. Schwartz, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP and counsel to Defendants Amazon.com, Inc. and Amazon.com Services LLC (collectively, "Amazon") in the above-captioned action. I am licensed to practice law in the Commonwealth of Virginia, the State of Maryland, and the District of Columbia. I was admitted *pro hac vice* on behalf of Amazon to the U.S. District Court for the Eastern District of New York on June 25, 2020.

2. I submit this declaration in support of Defendants' Reply in Support of Their Motion to Dismiss, dated September 1, 2020.

3. Attached hereto as Exhibit A is a true and correct copy of the brief that the U.S. Department of Labor filed in *Does v. Scalia*, No. 3:20-cv-1260 (M.D. Pa.) on August 21, 2020.

4. Attached hereto as Exhibit B is a true and correct copy of the transcript of the hearing held in *Does v. Scalia*, No. 3:20-cv-1260 (M.D. Pa.) on July 31, 2020.

5. Attached hereto as Exhibit C is a true and correct copy of the brief that the New York Attorney General filed in *Quirk v. Difiore*, No. 1:20-cv-5027 (S.D.N.Y.) on August 7, 2020.

6. Attached hereto as Exhibit D is a true and correct copy of the order issued by the court in *Wortman v. Princess Cruise Lines Ltd.*, No. 2:20-cv-4169 (C.D. Cal.) on August 21, 2020.

Dated: Rockville, Maryland
September 1, 2020

/s/ Jason C. Schwartz
Jason C. Schwartz